

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

| | | |
|---------------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CASE NO. 3:22-cr-00340 |
| |) | CHIEF JUDGE CRENSHAW |
| STEVEN L. PIPER |) | MAGISTRATE JUDGE HOLMES |

**UNOPPOSED MOTION TO MODIFY THE ORDER SETTING
CONDITIONS OF RELEASE (D.E. 16)**

Comes now Steven L. Piper, by and through counsel, and hereby moves the Court to modify the *Order Setting Conditions Of Release* (D.E. 16) in order to allow Mr. Piper to travel with his son, generally on weekends, to attend motocross events in which his son is a participant. Mr. Piper frequently attends these events, and these events are usually held outside the Middle District of Tennessee.

The *Order Setting Conditions Of Release* (D.E. 16) currently states that Mr. Piper shall “not travel outside the Middle District of Tennessee unless approved in advance by pretrial services” (See paragraph 7(f) of the *Order*.) Mr. Piper has received permission from the pretrial services officer (Taylor Stewart) to attend the motocross events. However, due to the frequency of the events, Ms. Stewart suggested that Mr. Piper move the Court to allow this exception to paragraph 7(f).

Ms. Stewart has no opposition to Mr. Piper traveling outside of the district to attend the motocross events. A modification of the *Order* will eliminate the need for frequent travel requests by Mr. Piper to Ms. Stewart and will eliminate the need for Ms. Stewart to address the frequent requests. In summary, it will be much more efficient to simply modify the *Order Setting Conditions Of Release* rather than to

require Mr. Piper to ask for permission to travel to the frequent motocross events and then have Ms. Stewart address each request.

The government does not oppose this motion.

Based upon the foregoing, Mr. Piper moves the Court to modify the *Order Setting Conditions Of Release* (D.E. 16) to allow Mr. Piper to travel with his son, generally on weekends, to attend motocross events in which his son is a participant.

Respectfully submitted,

s/ **Paul J. Bruno**

Paul J. Bruno, B.P.R. #17275

Barrett, Johnston, Martin & Garrison, LLC

414 Union Street, Suite 900

Nashville, Tennessee 37219

(615) 244-2202

pbruno@barrettjohnston.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Unopposed Motion To Modify The Order Setting Conditions Of Release (D.E. 16)* has been emailed via the Court's electronic filing system to Kathryn W. Booth, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, TN 37203, and to Peter J. Strianse, Tune, Entrekin & White, P.C., Capitol View, 500 11th Avenue North, Suite 600, Nashville, Tennessee 37203, on this the 20th day of December, 2022.

s/ **Paul J. Bruno**

Paul J. Bruno